

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**H&R BLOCK TAX SERVICES LLC,**

**Plaintiff,**

**v.**

**Case No. 12-CV1320-SOW**

**LUTGARDO ACEVEDO-LOPEZ,**

**Defendant.**

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Come now Plaintiff and Defendant, by and through their undersigned attorneys, and jointly move the Court to Amend the Scheduling Order and extend deadlines as follows:

1. Extend the close of discovery by 60 days, to September 16, 2013;
2. Extend the dispositive motion deadline to October 16, 2013;
3. Extend the deadline for Defendant's disclosure of the narrative of his expert's testimony to July 15, 2013;
4. Establish a deadline of August 15, 2013, for Plaintiff's designation of a rebuttal expert and disclosure of a narrative of testimony.

In support of their joint motion, the parties state:

1. No previous extension of deadlines has been requested.
2. The parties have diligently pursued discovery, including exchanges of written discovery requests and production of documents.
3. Additional time is needed to complete written discovery and depositions in this matter. The parties are deposing multiple witnesses in the Territory of Puerto Rico and in several

states, and additional time is needed to coordinate the schedules of witnesses and counsel.

4. The brief extension is not requested for purposes of delay, and it does not prejudice either party or the court, as trial has not been scheduled in this matter.

WHEREFORE, Plaintiff and Defendant jointly move the Court to Amend the Scheduling Order and extend discovery and motion deadlines.

/s/ David M. Kight

David M. Kight, Mo. Bar 52260  
Casey Murray, Mo. Bar 58741  
Spencer Fane Britt & Browne LLP  
1000 Walnut Street, Suite 1400  
Kansas City, MO 64106

and

Iris Figueroa Rosario  
Peter J Klarfeld  
Gray, Plant, Mooty, Mooty and Bennett, PA  
600 New Hampshire Avenue N.W.  
The Watergate - Suite 700  
Washington, DC 20037  
Attorneys for Plaintiff

SWANSON MIDGLEY, LLC

/s/ John J. Miller

John J. Miller, #32215  
4600 Madison, Suite 1100  
Kansas City, MO 64112  
Phone: 816-842-6100  
Fax: 816-842-0013  
Email: jmillers@swansonmidgley.com

-And-

Marie E. LópezAdames  
USDCPR 208212  
GONZALEZ LOPEZ & LOPEZ ADAMES  
#1126 Ashford Ave. Suite C-10  
The Diplomat Condominium  
San Juan PR 00907  
Phone: 787-724-821  
Fax: 787-722-8289  
Email: bufete@gllalaw.com

Attorneys for Defendant